

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re Innovatio IP Ventures, LLC, Patent Litigation	Case No. 1:11-cv-09308
This Document Relates To:	Judge James F. Holderman Magistrate Judge Sidney Schenkier
All Cases	

EXHIBITS TO DEFENDANTS' RESPONSES TO ESSENTIALITY BRIEF

Exhibit A - Index providing, for each allegedly “non-essential” claim element, an identification of the bases for essentiality that apply to that element

Exhibit B - Declaration of Matthew B. Shoemake, Ph.D. [**Filed Under Seal**]

Exhibit B1 - Materials Considered by Matthew B. Shoemake, Ph.D.

Exhibit C - Declaration of Dr. Stephen B. Wicker, Ph.D. [**Filed Under Seal**]

Exhibit C1 - Materials Considered by Dr. Stephen B. Wicker, Ph.D.

Exhibit 1 - Curriculum Vitae of Matthew B. Shoemake, Ph.D. [**Filed Under Seal**]

Exhibit 2 - Curriculum Vitae of Dr. Stephen B. Wicker, Ph.D.

Exhibit 3 - IEEE-SA Standards Board Bylaws, December 2012

Exhibit 4 - IEEE Standards Board Operations Manual, December 2012

Exhibit 5 - USPTO Assignment Abstract of Title for U.S. Patent No. 6,714,559

Exhibit 6 - Intermec's October 26, 1995 Letter of Assurance

Exhibit 7 - Broadcom's October 17, 2006 Letter of Assurance

Exhibit 8 - Broadcom's September 6, 2002 Letter of Assurance #1

Exhibit 9 - Broadcom's September 6, 2002 Letter of Assurance #2

Exhibit 10 - Norand's June 20, 1997 Letter of Assurance

Exhibit 11 - U.S. Patent No. 7,457,646

Exhibit 12 - Chart of patent relationships

Exhibit 13 - IEEE-SA Standards Board Bylaws, January 1998

Exhibit 14 - Samik Bhattacharyya Deposition Transcript Excerpts **[Filed Under Seal]**

Exhibit 15 - U.S. Patent No. 7,873,343 claim charts sent to licensing targets relying exclusively on IEEE 802.11 standards **[Filed Under Seal]**

Exhibit 16 - Dec. 20, 2012 letter from E. Ogawa to licensing target **[Filed Under Seal]**

Exhibit 17 - Dec. 14, 2012 letter from E. Ogawa to licensing target **[Filed Under Seal]**

Exhibit 18 - Nov. 6, 2012 letter from E. Ogawa to licensing target **[Filed Under Seal]**

Exhibit 19 - Sept. 27, 2012 email from E. Ogawa to licensing target **[Filed Under Seal]**

Exhibit 20 - Sept. 28, 2012 letter from E. Ogawa to licensing target **[Filed Under Seal]**

Exhibit 21 - Eric Ogawa Deposition Transcript Excerpts **[Filed Under Seal]**

Exhibit 22 - Sample license agreement **[Filed Under Seal]**

Exhibit 23 - IEEE-SA Standards Board Bylaws, February 2006

Exhibit 24 - Innovatio's First Revised List of Asserted Standard-Essential and Standard Non-Essential Claims

Exhibit 25 - U.S. Patent No. 4,449,248

Exhibit 26 - U.S. Patent No. 5,142,550

Exhibit 27 - "Special Components Simplify Interface to PCMCIA Cards," Legg, Gregory, June 10, 1993

Exhibit 28 - IEEE Standards Board Operations Manual, December 2005

Exhibit 28A - IEEE P802.11s/D4.0, December 2009

Exhibit 29 - Innovatio's Final Infringement Contentions **[Filed Under Seal]**